

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO

C.L. TRUSTEES, et al., on behalf of all others
similarly situated,

Plaintiffs,

v.

LOCKHEED MARTIN, IMS., et al.,

Defendants.

CASE NOS. GIC773619

GIC773950

NOTICE OF PENDENCY OF CLASS ACTION

**IF YOU RECEIVED A TICKET BECAUSE OF A RED LIGHT PHOTO ENFORCEMENT CAMERA SYSTEM,
YOU MAY BE A MEMBER OF A CLASS ACTION LAWSUIT CHALLENGING THE SYSTEM AND
SEEKING MONEY.**

A California Court authorized this Notice. This is not a solicitation from a lawyer.

WHAT IS THIS?

The Superior Court has certified two lawsuits as class actions. These lawsuits challenge the red light photo enforcement systems operated in the Cities of Beverly Hills, Cupertino, El Cajon, Imperial Beach, Indian Wells, Los Angeles, Oxnard, Poway, Redwood City, Sacramento, San Diego, San Francisco, Santa Rosa, or West Hollywood or the County of Los Angeles.

The lawsuits seek to recover money for fines, bail forfeitures and attorneys' fees paid by Class Members as a result of a citation issued from any of these red light photo enforcement systems.

AM I A CLASS MEMBER?

If you meet the definition of the Class below, you may be a member of the Class and have certain legal rights.

**HOW DO I REMAIN A
MEMBER OF THE CLASS?**

If you wish to remain in the Class, you do not have to do anything at this time.

CAN I EXCLUDE MYSELF?

If you do not wish to remain in the Class, you may exclude yourself by following the procedure described below.

These rights and options – **and the deadlines to exercise them** – are explained in this Notice.

QUESTIONS? VISIT WWW.REDLIGHTCASES.COM.

The Class Representatives claim that the red light photo enforcement systems operated in certain cities and the County of Los Angeles are illegal because (1) they are operated by a private, for-profit corporation instead of government agencies in cooperation with law enforcement and (2) the private, for-profit corporation is paid if money is collected from the red light ticket.

The Class Representatives seek to recover fines, penalties, forfeited bail amounts and attorneys' fees that Class Members paid as a result of their citations, punitive damages, restitution, a declaration that the Defendants' conduct is illegal and an order from the Court prohibiting the Defendants from continuing these practices.

Defendants deny all allegations of wrongdoing.

The Court has made no determination of the merits of Plaintiffs' or Defendants' case.

You may be a member of the Class if you paid fines, penalties, bail or attorneys' fees as a result of a citation issued from a red light automated enforcement system operated in the Cities of Beverly Hills, Cupertino, El Cajon, Imperial Beach, Indian Wells, Los Angeles, Oxnard, Poway, Redwood City, Sacramento, San Diego, San Francisco, Santa Rosa, or West Hollywood or the County of Los Angeles.

Excluded from the Class are the officers, directors and employees of Defendants, any judge presiding over this matter and members of the judge's family.

The Defendants are Lockheed Martin, IMS, Corp., ACS State and Local Solutions, Inc., Affiliated Computer Services, Inc., and Del Mar Ventures LLC (formerly known as U.S. Public Technologies LLC). For those Class Members who were issued tickets in the City of San Diego, Defendants also include the City of San Diego, the County of San Diego and the State of California.

The Court has designated the Plaintiffs who brought these actions as Class Representatives. Plaintiffs' Counsel, some of whom are listed below, are the lawyers for the Class. If you decide to remain a member of the Class, these Class Representatives and these lawyers will act as your representatives and lawyers for these lawsuits against the Defendants.

You will not be personally responsible for any costs or attorneys' fees incurred in these lawsuits. If the Court orders a judgment in favor of the Class or if class-wide settlements are obtained, the lawyers for the Class will request that the Court award attorneys' fees and reimbursement of costs to be paid by the Defendants or out of any funds recovered on behalf of the Class.

You have a choice as to whether or not to remain a member of the Class.

By remaining a Class Member, you will be bound by any judgment benefiting or adverse to the Class and you may not maintain a separate lawsuit. If you remain a member of the Class, you will have your claim for money and other relief decided in this lawsuit and receive your portion, if any, of a judgment in favor of the Class.

If you want to remain a member of the Class, but you do not wish to be represented by the Class Representatives and their counsel, you may enter an appearance through your own attorney at your own expense. To do so, you must file an Entry of Appearance with the Clerk of the Court. You will remain a Class Member with representation by your own attorney and you will be responsible for the fees and costs of your attorney.

If you do not wish to be a member of the Class, you may exclude yourself. In order to exclude yourself from the Class, you must notify the Court at the address identified below ***in writing no later than August 22, 2003***.

Your request for exclusion ***must*** contain: (1) the name of this lawsuit; (2) your full name and current address; (3) your signature; (4) a statement of intention to exclude yourself from this lawsuit such as "I wish to be excluded from the Class"; and (5) your red light citation number.

Requests for exclusion ***must be postmarked no later than August 22, 2003*** and sent to the address listed below:

Red Light Camera Litigation
c/o Complete Claim Solutions, Inc.
P. O. Box 24690
West Palm Beach, FL 33416

If you elect to be excluded from the Class, you will not be bound by any settlement or judgment, whether or not favorable. In other words, (1) you will not share in any recovery as a result of a judgment in favor of Plaintiffs and (2) you will not be bound by any judgment in favor of Defendants. You may, at your own expense, proceed individually against Defendants and others, subject to any applicable defenses, including statutes of limitation.

All references in this Notice to pleadings and Court orders are only summaries. Complete copies of the pleadings, orders and other documents filed in this litigation may be examined and copied at any time during regular office hours at the offices of the Clerk of the Court, San Diego Superior Court, 330 West Broadway, San Diego, California 92101. The cases are *C.L. Trustees v. Lockheed Martin, IMS*, Case No. GIC773619; and *Jerrold Cook v. Lockheed Martin, IMS*, Case No. GIC773950.

Certain documents and other information are also available on the Internet at www.redlightcases.com.

If you have any questions concerning any matter raised in this Notice, or wish to provide us with your current name or address, please visit the website or write to any of the attorneys identified below, who are designated as Class Counsel:

MILBERG WEISS BERSHAD HYNES & LERACH LLP
Timothy G. Blood, Esq.
Helen I. Zeldes, Esq.
401 B Street, Suite 1700
San Diego, CA 92101

WINGERT, GREBING, BRUBAKER & RYAN
Charles R. Grebing, Esq.
Eric Deitz, Esq.
600 West Broadway, 7th Floor
San Diego, CA 92101

PLEASE DO NOT CALL OR WRITE TO THE COURT FOR INFORMATION OR ADVICE.

DATED: May 16, 2003

BY ORDER OF THE SUPERIOR COURT
OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO